

# **EXHIBIT D**

**From:** Marc Kaplan <marckaplan@quinnemanuel.com>  
**Sent:** Wednesday, March 16, 2022 10:42 AM  
**To:** Caridis, Alyssa; QE-Sonos3  
**Cc:** Sonos-NDCA06754-service  
**Subject:** RE: Sonos v Google NDCA -- Supplemental Contentions

**This message originated from outside your organization**

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Alyssa,

It appears that Sonos is merely supplementing its contentions with additional source code cites for YTTV and YT Kids, which Google produced on February 1. We do not object to your proposed amendment.

Thanks,  
Marc

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**From:** Caridis, Alyssa <acaridis@orrick.com>  
**Sent:** Wednesday, March 16, 2022 12:36 PM  
**To:** QE-Sonos3 <qe-sonos3@quinnemanuel.com>  
**Cc:** Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>  
**Subject:** RE: Sonos v Google NDCA -- Supplemental Contentions

[EXTERNAL EMAIL from [acaridis@orrick.com](mailto:acaridis@orrick.com)]

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Counsel –

We understand by your silence that Google will oppose Sonos's motion to amend its contentions to account for the newly produced YouTube TV and YouTube Kids source code. If that understanding is incorrect, please let me know ASAP.

Alyssa

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**From:** Caridis, Alyssa  
**Sent:** Tuesday, March 8, 2022 7:07 PM  
**To:** QE-Sonos3 <[qe-sonos3@quinnemanuel.com](mailto:qe-sonos3@quinnemanuel.com)>  
**Cc:** Sonos-NDCA06754-service <[Sonos-NDCA06754-service@orrick.com](mailto:Sonos-NDCA06754-service@orrick.com)>  
**Subject:** Sonos v Google NDCA -- Supplemental Contentions

Counsel –

Sonos intends to move the Court to supplement its infringement contentions in light of Google's production of YouTube TV and YouTube Kids source code pursuant to LPR 3-6. As you are aware, Google first notified Sonos


that the source code for those products was available for inspection on February 1. Sonos's proposed amendments to its claim charts add citations to this newly-produced code. Momentarily, Amy Maruska will send the amended contentions via FTP (the password is **Sonos2ic222#**). Those PDFs are redlines that show Sonos's proposed additions relative to the charts submitted with Sonos's Second Motion to Amend (filed March 2).

Please let us know by COB Friday March 11 whether Google will oppose Sonos's motion to amend its contentions to include these supplements.

Alyssa Caridis

**Alyssa Caridis**  
Intellectual Property  
Partner

Pronouns: she/her/hers

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